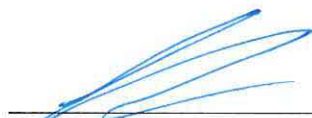


APPROVED:

 1 G.D.L.  
SHAWN G. CROWLEY / GEORGE D. TURNER  
Assistant United States Attorneys

BEFORE: THE HONORABLE KATHARINE H. PARKER  
United States Magistrate Judge  
Southern District of New York

18 MAG 6755

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UNITED STATES OF AMERICA

: SEALED COMPLAINT

- v. -

: Violations of  
21 U.S.C. §§ 952, 959,  
960 & 963; 18 U.S.C.  
§§ 2, 1956 & 3238

JEVGENI BOKOV,  
AMID MAGERRAMOV,  
NIKOLAI NIFTALIJEV, and  
VITALI VORONJUK,

:  
:  
:

Defendants.  
----- X

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS W. FRICK, being duly sworn, deposes and says that he is a Special Agent of the Drug Enforcement Administration ("DEA"), and charges as follows:

COUNT ONE

**(Narcotics Importation Conspiracy)**

1. From at least in or about October 2017, up to and including in or about July 2018, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, and others known and unknown, intentionally and knowingly combined, conspired, confederated, and agreed to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, would and did import into the United States and into the customs territory of the United States from a place outside thereof

controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 960(a)(1).

3. It was further a part and an object of the conspiracy that JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, would and did manufacture, possess with intent to distribute, and distribute controlled substances, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 959(a) and 960(a)(3).

4. The controlled substances that JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, conspired to (a) import into the United States and into the customs territory of the United States from a place outside thereof, and (b) manufacture, possess with intent to distribute, and distribute, intending, knowing, and having reasonable cause to believe that such substances would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States from a place outside thereof, were (a) 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, an analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide ("fentanyl"); and (b) 400 grams and more of mixtures and substances containing a detectable amount of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 952(a), 959(a), 959(d), 960(a), 960(b)(1)(F), and 963; Title 18, United States Code, Section 3238.)

**COUNT TWO**  
**(Narcotics Distribution for Importation)**

5. On or about at least May 9, 2018, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do the same, a controlled substance, intending, knowing, and having reasonable



cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, from a place outside thereof, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.

6. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, an analogue of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

### **COUNT THREE**

#### **(Narcotics Distribution for Importation)**

7. On or about at least May 30, 2018, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, who are expected to be first brought to and arrested in the Southern District of New York, intentionally and knowingly manufactured, possessed with intent to distribute, and distributed, and attempted to do the same, a controlled substance, intending, knowing, and having reasonable cause to believe that such substance would be unlawfully imported into the United States and into waters within a distance of 12 miles of the coast of the United States, in violation Title 21, United States Code, Sections 959(a), 960(a)(3), and 963.

8. The controlled substance involved in the offense was 100 grams and more of mixtures and substances containing a detectable amount of carfentanil, an analogue of fentanyl, in violation of Title 21, United States Code, Section 960(b)(1)(F).

(Title 21, United States Code, Sections 959(a), 959(d), 960(b)(1)(F), and 963; Title 18, United States Code, Sections 2 and 3238.)

**COUNT FOUR**  
**(Money Laundering)**

9. From at least in or about December 2017, up to and including at least in or about January 2018, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, JEVGENI BOKOV, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, (a) transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds to a place inside the United States from and through a place outside the United States, with the intent to promote the carrying on of specified unlawful activity, to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a); and (b) with the intent to (i) promote the carrying on of specified unlawful activity -- to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a) -- and (ii) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of that specified unlawful activity, conducted and attempted to conduct financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used to conduct and facilitate that specified unlawful activity.

(Title 18, United States Code, Sections 2, 1956(a)(2),  
1956(a)(3), and 3238.)

**COUNT FIVE**  
**(Money Laundering)**

10. From at least in or about March 2018, up to and including at least in or about April 2018, in the Southern District of New York and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular State or district, JEVGENI BOKOV, the defendant, who is expected to be first brought to and arrested in the Southern District of New York, (a) transported, transmitted, and transferred, and attempted to transport, transmit, and transfer, a monetary instrument and funds to a place inside the United States from and through a place outside the United States, and attempted to do the same, with the intent to promote the carrying on of specified unlawful activity, to wit, the unlawful importation into the United States of controlled substances, in violation of



Title 21, United States Code, Sections 952(a) and 959(a); and (b) with the intent to (i) promote the carrying on of specified unlawful activity -- to wit, the unlawful importation into the United States of controlled substances, in violation of Title 21, United States Code, Sections 952(a) and 959(a) -- and (ii) conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of that specified unlawful activity, conducted and attempted to conduct financial transactions involving property represented to be the proceeds of that specified unlawful activity, and property used to conduct and facilitate that specified unlawful activity.

(Title 18, United States Code, Sections 2, 1956(a)(2), 1956(a)(3), and 3238.)

The bases for my knowledge and the foregoing charges are as follows:

11. I have been a DEA Special Agent since 2005. I am currently assigned to the DEA Special Operations Division's Bilateral Investigations Unit, which focuses on international criminal activities. During my time as a DEA Special Agent, I have become familiar with some of the ways in which narcotics traffickers operate, and have participated in numerous investigations involving international drug trafficking. I have been personally involved in the investigation of this matter. This affidavit is based on my communications with other law enforcement officers and other individuals, and on my review of various reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause for the offenses cited above, it does not include all of the facts that I have learned during the course of the investigation. Where the contents of communications with others and statements by others are reported herein, they are reported in substance and in part, except where otherwise indicated.

#### Overview

12. As set forth in greater detail below, since at least October 2017, JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and others known and unknown, have conspired to import large quantities of carfentanil and fentanyl into the United States.<sup>1</sup> BOKOV,

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<sup>1</sup> Fentanyl is a synthetic opioid that is significantly more potent than heroin. Carfentanil is an analogue of fentanyl that is approximately 100 times more potent than fentanyl and

MAGERRAMOV, NIFTALIJEV, VORONJUK, and others have participated in a series of recorded meetings and phone communications with an individual they understood to be affiliated with an international drug trafficking organization (the "DTO"), for the purpose of arranging to import carfentanil and fentanyl into the United States. That individual was, in fact, a DEA confidential source ("CS-1"<sup>2</sup>). In addition, BOKOV, through a series of in-person recorded meetings and phone communications with CS-1, has laundered hundreds of thousands of dollars from Europe to the United States, which money he understood to be narcotics proceeds.

13. In October 2017, JEVGENI BOKOV and AMID MAGERRAMOV, the defendants, met with CS-1 in a country in eastern Europe ("Country-1"). See infra ¶ 20. During the meeting, CS-1 informed BOKOV and MAGERRAMOV that CS-1 was a member of a Colombian drug cartel that distributed narcotics in, among other places, the United States, and laundered the resulting proceeds. Several days later, on or about October 20, 2017, CS-1 met with BOKOV to discuss a money laundering transaction for the DTO. During the meeting, BOKOV agreed to transfer narcotics proceeds from Country-1 to the United States. See infra ¶ 21.

14. Throughout November and December 2017, JEGVENI BOKOV, the defendant, continued communicating with CS-1 concerning money laundering transactions. On December 7, 2017, CS-1 provided BOKOV with approximately €50,000 in cash, which BOKOV understood to constitute narcotics proceeds, and BOKOV agreed to transfer the cash to a bank account in New York, New York. See infra ¶ 22. The following month, in or about January 2018, BOKOV transferred the €50,000, less his five percent commission payment, to the New York bank account. See infra ¶ 25.

15. In or about March 2018, CS-1 participated in several recorded meetings with JEVGENI BOKOV, the defendant, to coordinate an additional money laundering transaction. See infra ¶¶ 32-33. On or about March 17, 2018, CS-1 provided BOKOV with approximately €200,000 in cash, which money BOKOV understood to constitute narcotics proceeds. BOKOV agreed to transfer the money from Country-1 to a bank account in New York, New York. See infra ¶ 33. Between on or about March 21, 2018 and on or

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approximately 1,000 times more potent than heroin.

<sup>2</sup> CS-1 has been a paid DEA source since approximately 2014. Information provided by CS-1 has proven reliable and has been corroborated by independent evidence, including audio/video recordings.



about April 17, 2018, BOKOV transferred the €200,000, less a five percent commission payment, to the New York bank account. See infra ¶ 24.

16. Throughout the winter and spring of 2018, CS-1 participated in a series of recorded meetings with AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, to discuss narcotics transactions. During the meetings, MAGERRAMOV, NIFTALIJEV, and VORONJUK agreed to provide CS-1 with fentanyl in a country in Europe ("Country-2"). MAGERRAMOV, NIFTALIJEV, and VORONJUK understood that the fentanyl would be transported to the United States, where it would be mixed with heroin and other controlled substances, and sold to the DTO's customers in New York City, among other places. See infra ¶¶ 26-31.

17. In or about May 2018, AMID MAGERRAMOV, the defendant, coordinated the transfer of samples of carfentanil to CS-1 in Country-2. See infra ¶ 35. MAGERRAMOV understood that CS-1 would retrieve the samples and have them delivered to New York, New York. On or about May 9, 2018, MAGERRAMOV and NIKOLAI NIFTALIJEV and VITALI VORONJUK, the defendants, delivered three samples of narcotics to an agreed-upon location in Country-2. See infra ¶¶ 35-36. The three samples were subsequently tested in a laboratory in Country-2 and confirmed to contain approximately 550 grams of mixtures and substances containing carfentanil. See infra ¶ 36. CS-1 later informed MAGERRAMOV that the three samples had been transported to the United States, that the DTO was satisfied with the quality of the narcotics, and that CS-1 wanted to purchase additional quantities of carfentanil from MAGERRAMOV and his associates. See infra ¶ 37.

18. In late May 2018, AMID MAGERRAMOV, the defendant, arranged to have additional carfentanil delivered to CS-1 for importation into the United States. See infra ¶ 38. On or about May 30, 2018, VITALI VORONJUK, the defendant, and another individual delivered approximately 5.2 kilograms of mixtures and substances containing carfentanil to a pre-arranged location in Country-2. See infra ¶ 39. CS-1 subsequently reported to MAGERRAMOV that the carfentanil had been transported to the United States. See id.

19. Throughout June and July 2018, CS-1 continued to communicate and meet with JEVGENI BOKOV, AMID MAGERRAMOV, and VITALI VORONJUK, the defendants, concerning payment for the carfentanil and future narcotics transactions. See infra ¶¶ 40-

43. On or about July 17, 2018, CS-1 provided BOKOV with approximately \$20,000, and BOKOV agreed to transfer that money to MAGERRAMOV. BOKOV and MAGERRAMOV understood that the \$20,000 payment was for additional carfentanil that would be imported into the United States. See infra ¶¶ 42-43.

### The Investigation

20. Based on my participation in this investigation, my conversations with other law enforcement officers involved in this investigation, and my review of DEA reports, I have learned, among other things, that on or about October 13 and 14, 2017, CS-1, at the DEA's direction, participated in meetings with, among others, JEVGENI BOKOV and AMID MAGERRAMOV, the defendants, in Country-1. BOKOV and MAGERRAMOV, who met together with CS-1, understood from CS-1 that CS-1 was a member of the DTO, which operated in Colombia and needed assistance laundering narcotics proceeds. During the meetings, which were not recorded, the following occurred, in substance and in part:

a. MAGERRAMOV provided his phone number to CS-1 and informed CS-1, in sum and substance, that he was "well-connected" in a country in Eurasia. Based on my training, experience, and participation in this investigation, I believe that MAGERRAMOV was informing CS-1 that MAGERRAMOV had contacts within organized crime organizations in the Eurasian country who could help MAGERRAMOV traffic narcotics and launder the resulting proceeds.

b. BOKOV informed CS-1, in sum and substance, that in November 2016, law enforcement in Colombia had seized approximately €400,000 from BOKOV as he was transiting through the country. BOKOV showed CS-1 a photograph of a letter from a Colombian prosecutor regarding the seizure.<sup>3</sup> BOKOV asked CS-1 for help retrieving the money.

c. BOKOV, MAGERRAMOV, and CS-1 agreed to meet again in the future.

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<sup>3</sup> Based on my conversations with other law enforcement personnel, I have learned that, on or about November 12, 2016, Colombian agents arrested BOKOV in an airport in Colombia, seized approximately €403,080 from him, and charged him with money laundering offenses. The charges were later dismissed and BOKOV was released.



**October 20, 2017: Meeting with BOKOV to Discuss Money  
Laundering Transactions**

21. On or about October 20, 2017, at the DEA's direction, CS-1 met with JEVGENI BOKOV, the defendant, in a country in Europe ("Country-3"). During the meeting, which was recorded, CS-1 and BOKOV discussed a potential money laundering transaction. Based on my review of DEA reports, recordings, and draft transcripts of the October 20, 2017 meeting, as well as my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part<sup>4</sup>:

a. CS-1 informed BOKOV that the DTO shipped large quantities of cocaine, by boat and airplane, to different parts of the world, including Europe, and that those shipments generated large quantities of cash. CS-1 explained that the DTO needed assistance moving the cash back to Colombia via companies based in the United States.

b. BOKOV agreed to move the DTO's cash proceeds, by wire transfer, from Country-1 to the United States. BOKOV explained that BOKOV would use his "companies" in Country-1 to initiate the wire transfers, and asked CS-1 to confirm that the companies that would receive the transfers in the United States were "clean." CS-1 confirmed that the receiving companies were "clean."

c. BOKOV stated that he would charge CS-1 a five percent commission on each wire transfer to the United States. BOKOV informed CS-1 that he had the ability to transfer up to €5 million every month.

**December 2017 - January 2018: BOKOV Transfers Purported  
Narcotics Proceeds to the United States**

22. On or about December 6 and 7, 2017, at the DEA's direction, CS-1 participated in recorded meetings with JEVGENI

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<sup>4</sup> All quotations in this Complaint drawn from meetings are based on a review of audio recordings, video recordings, and/or preliminary draft transcripts and translations, and are thus subject to revision upon the preparation of finalized transcripts and translations. All of the meetings referenced in the Complaint were conducted principally in English. From time to time during the meetings, some of the participants spoke with one another in Russian. I have reviewed draft translations of portions of the Russian conversations.

BOKOV, the defendant, in Country-1 (the "December 2017 Meetings"). Based on my review of DEA reports, recordings, and draft transcripts of the December 2017 Meetings, and my communications with CS-1, I have learned that the following occurred during the meeting on or about December 6, 2017, in substance and in part:

a. CS-1 asked BOKOV how long it would take BOKOV to transfer the DTO's money to the United States. BOKOV told CS-1 that the transfer would take one day. BOKOV confirmed that he transferred money to various countries every day.

b. CS-1 asked BOKOV if, after BOKOV made an initial transfer of the DTO's money to the United States, BOKOV could do "another one, right away," which I understand to mean, based on my participation in this investigation, including my conversations with CS-1, another transfer of narcotics proceeds to the United States. BOKOV confirmed that he could.

c. BOKOV explained, in sum and substance, that in order to conceal the fact that the money he was transferring constituted narcotics proceeds, he would inform the bank initiating the transfer that the payment was for "equipment . . . electric and machine."

d. CS-1 gave BOKOV an envelope containing approximately €50,000 in cash.

23. Based on my review of DEA reports and recordings of the December 2017 Meetings, and my communications with CS-1, I have learned that the following occurred during the meeting on or about December 7, 2017, in substance and in part:

a. BOKOV gave CS-1 a document confirming that CS-1 had deposited €50,000 into a bank account in Country-1. BOKOV stated that he had directed the bank to transfer the €50,000, minus his five percent commission, to a bank account in the United States (the "UC Account"). Based on my participation in this investigation, I know that the UC Account is a bank account in New York, New York used by law enforcement to conduct undercover operations, and that CS-1 had previously provided the account information for the UC Account to BOKOV and asked BOKOV to transfer the money into that account.

24. Between on or about January 9 and 18, 2018, at the DEA's direction, CS-1 participated in several recorded meetings with JEVGENI BOKOV, the defendant, in Country-1. Based on my review of DEA reports, recordings, and draft transcripts of



those meetings, as well as my communications with CS-1, I know that, the following occurred during those meetings, in substance and in part:

a. During a meeting on or about January 9, 2018, BOKOV informed CS-1, in sum and substance, that BOKOV's bank would not transfer the DTO's money to the UC Account (see infra ¶ 23), and had instead returned the money to BOKOV's account. BOKOV agreed to attempt the transfer again.

b. During a meeting on or about January 15, 2018, BOKOV informed CS-1, in sum and substance, that the money CS-1 had provided to BOKOV had been successfully wired to the UC Account. BOKOV agreed to make additional transfers of narcotics proceeds for the DTO in the future, explaining that he had agreements with bank "partners" that allowed him to transfer between €16 and €20 million every three months.

c. During a meeting on or about January 18, 2018, BOKOV asked CS-1 if the UC Account had received the money BOKOV had transferred. CS-1 informed BOKOV that money transfers to the United States took approximately five days to process, and therefore the funds had not yet been received in credited to the UC Account. They then discussed future money transactions. CS-1 informed BOKOV, in sum and substance, that BOKOV could more easily transfer money for CS-1 if BOKOV opened bank accounts in the United States. BOKOV agreed, and asked CS-1 to help him open accounts at two different U.S. banks.

25. Based on my conversations with other law enforcement officers, and my review of DEA reports and bank records relating to the UC Account, I know that, on or about January 12, 2012, approximately \$56,144 in United States currency (i.e., the equivalent of approximately €50,000 less a five percent commission) was received into the UC Account (the "First Money Transfer"). The First Money Transfer was wired from an account at a bank in Country-1 -- which was purportedly owned by a company in Country-1 (the "Company") -- to the UC Account.

**January 16, 2018: MAGERRAMOV Agrees to Provide Fentanyl to the DTO**

26. On or about January 16, 2018, at the DEA's direction, CS-1 met with AMID MAGERRAMOV, the defendant, among others, in Country-1. During the meeting, which was recorded, CS-1 and MAGERRAMOV discussed, among other things, MAGERRAMOV providing CS-1 with fentanyl for the DTO to traffic. Based on my review of DEA reports and recordings of the January 16, 2018 meeting,

and my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part<sup>5</sup>:

a. CS-1 showed MAGERRAMOV a photograph depicting the Russian word for fentanyl and asked MAGERRAMOV if CS-1 could obtain that substance in Country-1. MAGERRAMOV informed CS-1, in sum and substance, that an individual arrested with fentanyl in Country-1 would receive a prison sentence of 10 years. MAGERRAMOV then explained that fentanyl "is made for rhinoceroses." MAGERRAMOV further informed CS-1 that he "knew a lot about" fentanyl, and that when "[p]eople don't know the dose, [they] die." Based on my training and experience, and as noted above, I have learned that fentanyl is a synthetic opioid that is significantly more potent than heroin, and that carfentanil is an analogue of fentanyl that is approximately 100 times more potent than fentanyl and approximately 1,000 times more potent than heroin. I know also that carfentanil is used commercially to tranquilize large animals such as elephants and rhinoceroses.

b. CS-1 informed MAGERRAMOV that the DTO was looking for a partner who could provide large quantities of fentanyl in Europe. CS-1 explained that the DTO would transport the fentanyl to Mexico, where it would be mixed with the DTO's heroin.

c. MAGERRAMOV told CS-1, among other things, that he knew "many people" who would be interested in providing the DTO with fentanyl. CS-1 explained that, for every 1,000 kilograms of heroin mixed with fentanyl that the DTO distributed, MAGERRAMOV would be paid 10% of the proceeds derived from the sales of the heroin-fentanyl mixture.

**February 17, 2018: MAGERRAMOV, NIFTALIJEV, and VORONJUK Meet with CS-1 to Discuss the Fentanyl Deal**

27. On or about February 17, 2018, at the DEA's direction, CS-1 met with AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, in a country in Europe ("Country-4"). I, along with other DEA agents, conducted surveillance of the meeting. Based on my review of DEA reports, recordings, and draft transcripts of the February 17, 2018 meeting, as well as

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<sup>5</sup> The January 16, 2018 meeting was conducted principally in English. From time to time during the course of the meeting, MAGERRAMOV spoke Russian into a translating application on his cellphone, which translated his words to English.



my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. MAGERRAMOV, NIFTALIJEV, and VORONJUK agreed to provide CS-1 with fentanyl in Europe. NIFTALIJEV asked CS-1 what the DTO would do with the fentanyl they provided. CS-1 explained that the DTO would mix the fentanyl with heroin. NIFTALIJEV asked CS-1 how much fentanyl the DTO would require each month. CS-1 replied that the DTO trafficked approximately 350 to 500 kilograms of heroin each month, but that it wanted to "reduce that amount and put more fentanyl . . . . So the idea was if we put the fentanyl with the heroin, our competition will lose because fentanyl is powerful. . . . And that's why we want to put the fentanyl inside because then we know we control the market." VORONJUK replied: "This is big business."

b. VORONJUK asked CS-1 where the DTO would distribute the heroin-fentanyl mixture. CS-1 explained that the DTO would distribute the drugs in, among other places, the United States.

c. CS-1 explained that the DTO sold one kilogram of heroin for approximately \$65,000 in New York, but that, when it mixed its heroin with fentanyl, the DTO would double the prices it charges for the narcotics. CS-1 stated: "[I]f I cut the fentanyl . . . we double the prices like for example, in New York from sixty-five it becomes a hundred and thirty."

d. CS-1 asked whether MAGERRAMOV, NIFTALIJEV, and VORONJUK had a laboratory to produce the fentanyl. VORONJUK explained that the police in Country-1 had recently shut down fentanyl laboratories in Country-1, and they would therefore have to produce the drugs in another country in Europe. MAGERRAMOV and VORONJUK stated, in sum and substance, that the fentanyl they would produce would be very strong. MAGERRAMOV then picked up a grain of salt and placed it on a napkin on the table. VORONJUK pointed to the grain of salt and stated: "One people. One people . . . This is . . . dead." Based on my participation in this investigation, including my conversations with CS-1, I believe that MAGERRAMOV and VORONJUK were explaining that an individual could overdose and die after ingesting the quantity of fentanyl equivalent to one grain of salt. MAGERRAMOV then stated: "I give you good product . . . tell me what you need, I give you what you need . . . . This is very strong." VORONJUK explained: "Yeah, take it easy. If you ask, very easy, take you very strong."

e. CS-1 stated that the DTO was interested in purchasing fentanyl from sources outside the United States because "the quality" of fentanyl in the United States was poor. VORONJUK agreed to provide fentanyl to the DTO, and explained: "You must know this is quality this is very dangerous . . . . Very dangerous shit, this is big quality."

f. The parties agreed to meet again in the future so that MAGERRAMOV, VORONJUK, and NIFTALIJEV could provide CS-1 with a sample of fentanyl for the DTO.

**March - April 2018: MAGERRAMOV and VORONJUK Meet with CS-1 to Discuss the Fentanyl Deal, and BOKOV Transfers Purported Narcotics Proceeds to the United States**

*Meetings to Discuss the Fentanyl Deal*

28. On or about March 6, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, in Country-1. I, along with other DEA agents, conducted surveillance of the meeting. Based on my review of DEA reports and recordings of the March 6, 2018 meeting, and my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CS-1 asked MAGERRAMOV and VORONJUK if they could provide CS-1 with a sample, or "test," of fentanyl for the DTO. VORONJUK agreed, and confirmed that they would meet CS-1 in another country in Europe and provide CS-1 with samples of three different batches of fentanyl (the "Three Samples"). CS-1 stated that, once the DTO had tested the Three Samples, CS-1 would inform VORONJUK and MAGERRAMOV which of the Three Samples the DTO preferred and order larger quantities of that batch of fentanyl.

b. MAGERRAMOV informed CS-1 that each of the Three Samples would consist of approximately 100 grams of fentanyl. VORONJUK explained that the Three Samples would contain fentanyl that was "strong . . . very strong and medium." VORONJUK said that the fentanyl they would provide was "very dangerous," even in "small, small, small" amounts.

c. VORONJUK informed CS-1 that he and his associates required an up-front payment of approximately €20,000 so that they could begin producing the fentanyl for the Three Samples. CS-1 agreed to pay VORONJUK and MAGERRAMOV €20,000.



d. The parties agreed that, after CS-1 gave VORONJUK and MAGERRAMOV the up-front payment of €20,000, an associate of CS-1 (the "Associate") would meet VORONJUK and MAGERRAMOV in Country-2 to receive the Three Samples. In a side conversation in Russian, VORONJUK and MAGERRAMOV discussed preparing the Three Samples in Country-2 in advance of the meeting.

e. CS-1 informed MAGERRAMOV and VORONJUK that CS-1 would return to Country-1 in approximately one week to provide MAGERRAMOV and VORONJUK with the €20,000 payment.

29. On or about March 15, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, in Country-1. I, along with other DEA agents, conducted surveillance of the meeting. Based on my review of DEA reports and recordings of the March 15, 2018 meeting, as well as my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CS-1 informed MAGERRAMOV and VORONJUK, in sum and substance, that CS-1 would give MAGERRAMOV and VORONJUK the up-front payment of €20,000 for the Three Samples the following day. See supra ¶ 28(c).

b. CS-1 stated that the DTO would mix the Three Samples -- i.e., 300 grams of fentanyl -- with approximately 600 kilograms of heroin.

c. MAGERRAMOV and VORONJUK confirmed that they would provide CS-1 with the Three Samples in Country-2 within three to four weeks. CS-1 explained that the Associate would pick up the Three Samples in Country-2, confirm that the narcotics contained in the Three Samples were good quality, and then transport the Three Samples to "start to work." Based on my participation in this investigation, including my conversations with CS-1, I understand that CS-1 was informing MAGERRAMOV and VORONJUK that, after receiving the Three Samples, members of the DTO would transport them to the United States, where the Three Samples would be mixed with heroin for distribution (i.e., "start to work").

d. The parties agreed that, once the Three Samples had been transported to the United States, the DTO would continue to purchase additional quantities of fentanyl from MAGERRAMOV, VORONJUK, and their associates approximately every six weeks.

30. On or about March 17, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, in Country-1. I and another DEA agent performed surveillance of the meeting, which was recorded. Based on my review of DEA reports and recordings of the March 17, 2018 meeting, as well as my communications with CS-1, I have learned that, during the meeting, CS-1 provided MAGERRAMOV and VORONJUK with €20,000 in cash, which constituted the up-front payment for the Three Samples. See supra ¶ 28(c).

31. On or about March 31, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, and another individual ("CC-1") in Country-1. Based on my review of DEA reports and recordings of the March 31, 2018 meeting, as well as my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CC-1 informed CS-1, in sum and substance, that MAGERRAMOV, VORONJUK, and CC-1 could provide CS-1 with the Three Samples in approximately one week. CS-1 asked CC-1 how long it would take, after the delivery of the Three Samples, to "start doing more work," which I understand, based on my participation in this investigation, to be a reference to future fentanyl deals. CC-1 replied that they would be prepared to provide additional shipments of narcotics approximately two days to a week after the delivery of the Three Samples.

b. CS-1 explained that, the following week, the Associate would park a car at a certain location in Country-2. CS-1 would provide MAGERRAMOV with the location of the parked car so that MAGERRAMOV could arrange to have the Three Samples delivered to the car.

c. CS-1 said that, after receiving the Three Samples, the Associate would "take it back" -- which I understand, based on my participation in this investigation, including my conversations with CS-1, to be a reference to the United States -- within two days.

*Meetings with BOKOV and the Second Money Laundering Transaction*

32. On or about March 7, 2018, at the direction of the DEA, CS-1 met with JEVGENI BOKOV, the defendant, in Country-1. During the meeting, which was recorded, CS-1 and BOKOV discussed another transfer of narcotics proceeds from Europe to the United States. Based on my review of DEA reports and recordings of the



March 7, 2018 meeting, as well as my conversations with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CS-1 informed BOKOV, in sum and substance, that CS-1 would provide BOKOV with €200,000 the following week for transfer to the United States. BOKOV agreed to transfer the money, and CS-1 stated, in sum and substance, that after the €200,000 transfer was complete, CS-1 would provide BOKOV with additional cash payments for transfer to the United States.

b. CS-1 then pointed to a piece of paper that contained the words, among others, "1,000 kgs cocaine," and explained that, from "this" -- i.e., 1,000 kilograms of cocaine," -- the DTO would make €18 million in proceeds, which would need to be laundered.

c. BOKOV agreed to continue moving money for the DTO, and stated: "I must open accounts in America. . . . It is very important for me because . . . European bank have problems. European bank very, very bad." BOKOV reiterated: "If I have account in American bank . . . I can send money from my banker . . . and put it in your account."

33. On or about March 17, 2018, at the direction of the DEA and following a meeting that same day with AMID MAGERRAMOV and VITALI VORONJUK, the defendants (see supra ¶ 30), CS-1 met with JEVGENI BOKOV, the defendant, in Country-1. I and other DEA agents performed surveillance of the meeting. Based on my review of a recording of the meeting and my conversations with CS-1, I know that, during the meeting, CS-1 gave BOKOV approximately €200,000 in cash, and asked BOKOV to wire the €200,000 to the UC Account.

34. Based on my conversations with other law enforcement officers, and my review of DEA reports and bank records relating to the UC Account, I know that, between on or about March 21 and April 17, 2018, approximately six wire transfers, totaling approximately \$229,124 (i.e., the equivalent of approximately €200,000 less a five percent commission) were made from accounts in various banks in Europe, including Country-1, to the UC Account (the "Second Money Transfer"). The Company was listed as the owner of one of the initiating accounts. See supra ¶ 25.

**May 9, 2018: MAGERRAMOV, NIFTALIJEV, and VORONJUK Deliver the Three Samples of Carfentanil for Importation into the United States**

35. Based on my review of DEA reports, my conversations with CS-1, and my review of certain of the contents of a phone used by CS-1 (the "CS-1 Phone"), I have learned that, in or about May 2018, at the direction of the DEA, CS-1 continued to communicate with AMID MAGERRAMOV, the defendant, concerning delivery of the Three Samples. For example, and in substance and in part:

a. On or about May 4, 2018, MAGERRAMOV exchanged electronic messages with CS-1. MAGERRAMOV informed CS-1, in sum and substance, that MAGERRAMOV would soon travel to Country-2 to prepare the Three Samples. MAGERRAMOV told CS-1 that his "guys" were already "there," which I understand, based on my participation in this investigation, to mean that VITALI VORONJUK and NIKOLAI NIFTALIJEV, the defendants, were already in Country-2 preparing the Three Samples.

b. On or about May 5, 2018, MAGERRAMOV exchanged electronic messages with CS-1. MAGERRAMOV informed CS-1, in sum and substance, that MAGERRAMOV had "good news" and asked CS-1: "When can we meet your man?" Based on my participation in this investigation, I believe that MAGERRAMOV was telling CS-1 that the Three Samples had been prepared and that MAGERRAMOV was ready to deliver them to the Associate in Country-2, as the parties had previously agreed. See supra ¶ 31. On or about the following day, May 6, CS-1 sent MAGERRAMOV an electronic message stating, in sum and substance, that the Associate would be ready to receive the Three Samples the following Tuesday -- i.e., May 8, 2018 -- in Country-2. MAGERRAMOV replied: "Ok. Tue[es]day we will be there."

c. On or about May 8, 2018, MAGERRAMOV sent electronic messages to CS-1 which stated, in sum and substance, that MAGERRAMOV would arrive in Country-2 the following day.

d. On or about May 9, 2018, MAGERRAMOV exchanged electronic messages with CS-1. MAGERRAMOV informed CS-1 that MAGERRAMOV had arrived in Country-2 and was prepared to deliver the Three Samples. CS-1 then sent MAGERRAMOV electronic messages containing an address of a hotel in a city in Country-2 (the "Hotel"); along with the model, color, and license plate number of a particular car ("Car-1"); and a photograph depicting an overhead image of a parking lot behind the Hotel. CS-1



wrote: "The trunk is unlocked," and explained that "[t]he car will be parked behind the hotel."

36. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of reports prepared by other law enforcement officers, I have learned, among other things, that on or about May 9, 2018, the following occurred, in substance and in part:

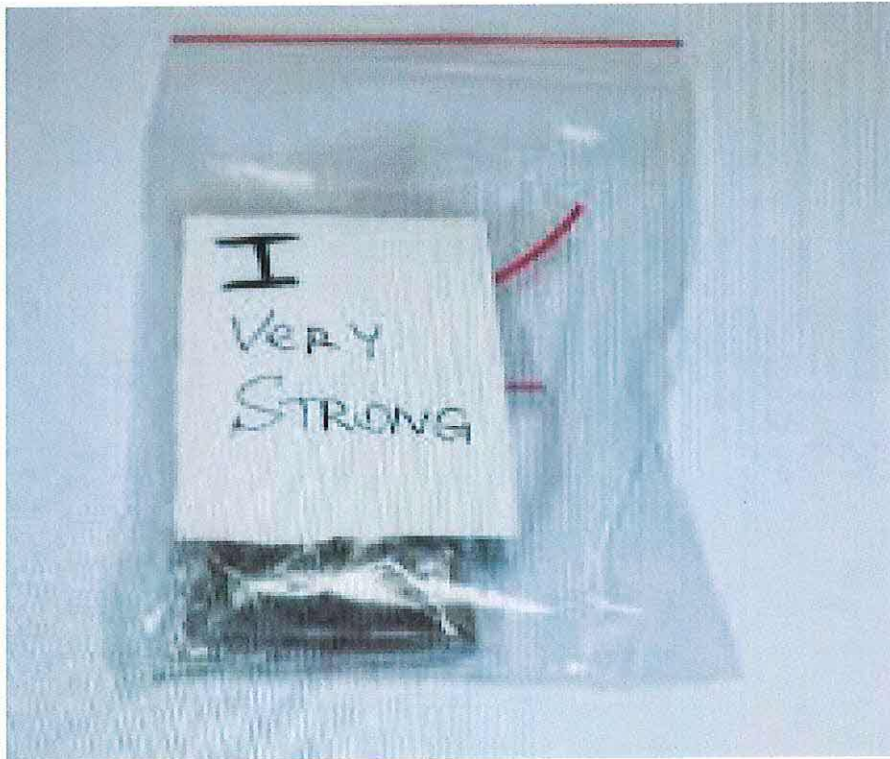
a. Law enforcement agents from Country-2 (the "Agents") parked Car-1 in the parking lot behind the Hotel. The Agents then performed surveillance of Car-1 in the vicinity of the Hotel.

b. The Agents observed NIKOLAI NIFTALIJEV, the defendant, approach Car-1, open the trunk, and place a package ("Package-1") inside the trunk. NIFTALIJEV then walked away. Shortly thereafter, the Agents observed NIFTALIJEV meet with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, near the Hotel.<sup>6</sup>

c. The Agents subsequently recovered Package-1 from the trunk of Car-1. Inside Package-1 were three blue rubber gloves. Inside the rubber gloves were five clear plastic bags containing a brown powdery substance (the "Bags"). One of the rubber gloves contained a Bag that was labeled: "I. Very Strong." Another of the gloves contained two Bags, one of which was labeled: "II. We think it's Better For you." The final glove contained two Bags, both of which were labeled with the number "III." Based on my participation in this investigation, including my conversations with CS-1 and my review of the recordings of the meetings described above, I believe that the numbers I, II, and III were references to the Three Samples -- i.e., three different batches of fentanyl -- that MAGERRAMOV, VORONJUK, and NIFTALIJEV had agreed to provide to CS-1. See supra ¶ 28. Photographs depicting the Bags are below:

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<sup>6</sup> The Agents took photographs of NIFTALIJEV as he placed Package-1 in Car-1. They also took photographs of MAGERRAMOV, NIFTALIJEV, and VORONJUK meeting nearby. I have compared the photographs to the video recordings made by CS-1 during the January, February, and March 2018 meetings described above, and have confirmed that the individuals depicted in the photographs are the same individuals who participated in the meetings with CS-1.







d. The brown powdery substances contained within the Bags was subsequently tested in a laboratory in Country-2 and each tested positive for the presence of carfentanil. The total weight of the Bags and the substances they contained was approximately 550 grams.

37. Based on my review of DEA reports, my conversations with CS-1, and my review of certain of the contents of the CS-1 Phone, I have learned that, on or about May 14, 2018, CS-1 communicated with AMID MAGERRAMOV, the defendant, by electronic message. CS-1 informed MAGERRAMOV, in sum and substance, that CS-1 was in New York and the "chemist is running the test today." Based on my participation in this investigation, including my conversations with CS-1, I believe that CS-1 was informing MAGERRAMOV that the Three Samples had been transported to New York City and the DTO's chemist was in the process of testing the quality of the narcotics.

**May 30, 2018: MAGERRAMOV and VORONJUK Deliver Five Kilograms of Carfentanil for Importation into the United States**

38. Based on my review of DEA reports, my conversations with CS-1, and my review of certain of the contents of the CS-1 Phone, I have learned that, throughout May 2018, at the

direction of the DEA, CS-1 continued to communicate with AMID MAGERRAMOV, the defendant, to arrange for another fentanyl transaction. For example, in substance and in part:

a. On or about May 22, 2018, MAGERRAMOV sent CS-1 an electronic message that stated, in sum and substance: "[I will be] in [Country-2] this Friday to prepare 5. Everything will be ready at . . . one week from now. Prepare your man on Tue[.]sday. But we let you know exactly at Sunday about stuff ready. The deal as before in [Country-2]." Based on my participation in this investigation, including my conversations with CS-1, I believe that MAGERRAMOV was informing CS-1 that he would have five kilograms of carfentanil for the DTO in Country-2 the following week.

b. On or about May 28, 2018, MAGERRAMOV exchanged electronic communications with CS-1. During the exchange, MAGERRAMOV provided CS-1 with a phone number for another individual ("CC-2") who would be delivering the five kilograms of carfentanil to the Associate in Country-2. MAGERRAMOV then told CS-1: "Evgeny sa[i]d to me that tomorrow you are in [Country-1]?" CS-1 confirmed, and MAGERRAMOV wrote: "Ok. I sa[i]d to Evgeny that I give you already watch." Based on my participation in this investigation, including my conversations with CS-1, I believe that "Evgeny" is a reference to JEVGENI BOKOV, the defendant, and that, in these electronic messages, MAGERRAMOV was informing CS-1 that MAGERRAMOV had told BOKOV that the narcotics had already been delivered to CS-1. CS-1 then asked MAGERRAMOV to have CC-2 contact CS-1 when CC-2 was ready to deliver the five kilograms, and confirmed that CS-1 would then provide CC-2 with "information for the delivery."

39. Based on my participation in this investigation, my conversations with other law enforcement officers, and my review of certain contents of the CS-1 Phone, I have learned that on or about May 30, 2018, the following occurred, in substance and in part:

a. CS-1 received an electronic communication from CC-2, which stated: "Hey, we are ready, provide me a place. Where to leave the material?" CS-1 then provided CC-2 with an address of a particular location (the "Location"), as well as the make, model, and color of a particular vehicle ("Car-2"). CS-1 informed CC-2, in sum and substance, that Car-2 would be parked at the Location at approximately 8:00 that night.

b. Country-2 agents parked Car-2 at the Location and performed surveillance of Car-2. The agents observed VITALI



VORONJUK, the defendant, and CC-2 arrive in the vicinity of the Location. VORONJUK approached Car-2 and placed a red plastic bag in the trunk of Car-2. VORONJUK and CC-2 then left the Location.

c. The Agents subsequently retrieved the red plastic bag from the trunk of Car-2. The Agents recovered from inside the red plastic bag two clear plastic bags containing a brown powdery substance. The brown powdery substance was subsequently tested in a laboratory in Country-2 and tested positive for the presence of carfentanil. The total weight of the brown powdery substance and the two clear plastic bags was approximately 5.2 kilograms.

d. Shortly thereafter, CS-1 sent an electronic message to MAGERRAMOV, which stated: "Was delivered 5.2." MAGERRAMOV responded, "Ok." The following day, on or about May 31, 2018, MAGERRAMOV sent an electronic message to CS-1, which stated, in part: "I have information, that 5.2 was stronger, like 10. When your guy will make the test you will know." Based on my training and experience and participation in this investigation, I believe that MAGERRAMOV was informing CS-1 that the 5.2 kilograms of carfentanil was more potent than the carfentanil in the Three Samples.

**June - July 2018: Meetings to Coordinate Future Narcotics Transactions and Payments for Narcotics**

40. On or about June 6, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, in Country-1. During the meeting, which was recorded, the parties discussed, among other things, the May 30, 2018 carfentanil transaction (see supra ¶ 29), as well as future narcotics deals. Based on my review of DEA reports and recordings of the June 6, 2018 meeting, as well as my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. MAGERRAMOV and VORONJUK informed CS-1 that, while preparing the carfentanil in Country-2 on or about May 30, 2018, NIKOLAI NIFTALIJEV, the defendant, had become ill and been hospitalized. Based on my conversations with law enforcement officers from Country-2, I have learned, in substance and in part, that on or about May 31, 2018, NIFTALIJEV was admitted to a hospital in Country-2, and that he was in a coma when he was admitted, was treated by medical staff, and was subsequently released.

b. CS-1 explained that the carfentanil the defendants had provided on May 30, 2018 had arrived in the United States and the DTO was satisfied with its quality. CS-1 said that CS-1's associates wanted to purchase larger quantities of carfentanil for importation to the United States.

c. MAGERRAMOV explained that he was leaving Country-1 the following day for a vacation in another country in Europe. CS-1 explained that CS-1 would meet with JEVGENI BOKOV, the defendant, to discuss setting up an account through which CS-1 would provide money to MAGERRAMOV while MAGERRAMOV was away. MAGERRAMOV and VORONJUK agreed that, once they had received payment from CS-1, they would begin the production of additional carfentanil for the DTO.

d. MAGERRAMOV and VORONJUK advised that the carfentanil they had provided on May 30, 2018 was "very very strong," and that a person could "get addicted" after using it "just one time."

41. The following day, on or about June 7, 2018, at the direction of the DEA, CS-1 met with JEVGENI BOKOV, the defendant, in Country-1. During the meeting, which was recorded, CS-1 and BOKOV discussed, among other things, future transfers of narcotics proceeds. Based on my review of DEA reports and recordings of the meeting, as well my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CS-1 again explained that the DTO shipped narcotics from South America to Europe via the United States. BOKOV and CS-1 agreed that, in the future, BOKOV would transfer at least €2 million in narcotics proceeds for the DTO, every month, from Europe to the United States, among other places.

b. CS-1 told BOKOV that CS-1 would provide BOKOV with money for BOKOV to give to AMID MAGERRAMOV, the defendant, for the "work" that CS-1 and MAGERRAMOV "did together," which I understand, based on my participation in this investigation and conversations with CS-1, to be a reference to the supply of carfentanil for importation into the United States. CS-1 informed BOKOV that MAGERRAMOV and his "crew" had recently traveled to Country-2 to "manufacture . . . this shit," and then pointed to a piece of paper containing the word fentanyl. BOKOV explained that MAGERRAMOV had to produce the fentanyl outside Country-1 because many people had recently been arrested in Country-1 for producing fentanyl. CS-1 told BOKOV that



MAGERRAMOV and his crew had produced the best quality fentanyl the DTO had ever received.

c. BOKOV agreed to transfer approximately €20,000 from CS-1 to MAGERRAMOV for the "work [MAGERRAMOV] did in [Country-1]," which I understand, based on my conversations with CS-1, to be a reference to the May 30, 2018 carfentanil transaction. CS-1 informed BOKOV that CS-1 would be meeting with MAGERRAMOV later that day to discuss future narcotics transactions.

42. Later that day, on or about June 7, 2018, at the direction of the DEA, CS-1 met with AMID MAGERRAMOV and VITALI VORONJUK, the defendants, and CC-1 in Country-1. Based on my review of DEA reports and recordings of the meeting, and my communications with CS-1, I have learned that the following occurred during the meeting, in substance and in part:

a. CS-1 said that CS-1 would soon pay MAGERRAMOV for the May 30, 2018 carfentanil shipment.

b. The parties agreed that, once CS-1 had provided payment, MAGERRAMOV, VORONJUK, CC-1, and NIKOLAI NIFTALIJEV, the defendant, would set up a laboratory in a country in Europe in order to produce additional quantities of carfentanil for the DTO. MAGERRAMOV and CC-1 explained that they would order the carfentanil components from their associates in different countries in Europe.

c. CS-1 said that "Evgeny" -- which I understand, based on my conversations with CS-1, to be a reference to JEVGENI BOKOV, the defendant -- would "handle" CS-1's money in Country-1 in the future. CS-1 explained that BOKOV would transfer the DTO's money to MAGERRAMOV for payments for narcotics.

43. Based on my review of DEA reports, my conversations with CS-1, and my review of certain of the contents of the CS-1 Phone, I have learned that, in or about July 2018, at the direction of the DEA, CS-1 communicated with JEVGENI BOKOV and AMID MAGERRAMOV, the defendants, to coordinate payments for the delivered carfentanil and future narcotics transactions. For example:

a. On or about July 17, 2018, CS-1 and MAGERRAMOV exchanged a series of electronic messages in which CS-1 informed MAGERRAMOV, among other things, that CS-1 had cash in an apartment (the "Apartment") in Country-1 "for the work you did

and more if you want to continue." Based on my participation in this investigation and my conversations with CS-1, I believe that "the work you did" is a reference to the carfentanil MAGERRAMOV and his associates had provided to CS-1 in May 2018. CS-1 further informed MAGERRAMOV that CS-1 would travel to Country-1 the following week, pick up the money from the Apartment, and provide it to BOKOV. BOKOV would then transfer the money to MAGERRAMOV. Finally, CS-1 told MAGERRAMOV that CS-1 had money available that day, which CS-1 would ask BOKOV to transfer to MAGERRAMOV. MAGERRAMOV provided CS-1 with information for a bank account he controlled (the "Magerramov Account").

b. Later that day, on or about July 17, 2018, CS-1 transferred approximately \$20,000 to a bank account controlled by BOKOV (the "July 2018 Payment"). CS-1 then sent BOKOV an electronic message containing the information for the Magerramov Account and asked BOKOV, in sum and substance, to transfer the July 2018 Payment to the Magerramov Account. CS-1 told BOKOV to "save the [Magerramov] [A]ccount number for future transactions," which I understand to mean, based on my participation in this investigation and my conversations with CS-1, future payments from CS-1 to MAGERRAMOV, through BOKOV, for narcotics. BOKOV agreed to transfer the July 2018 Payment and to save the Magerramov Account information.


c. On or about July 23, 2018, CS-1 exchanged a series of electronic messages with BOKOV. During the exchange, CS-1 informed BOKOV, in substance and in part, that CS-1 had approximately \$650,000 available in the Apartment, and asked BOKOV to retrieve the money and give it to "[A]mid [MAGERRAMOV], for the work he did," -- i.e., the May 2018 carfentanil transactions. BOKOV agreed to collect the \$650,000 from the Apartment and transfer it to MAGERRAMOV.

d. Later that day, on or about July 23, 2018, CS-1 exchanged a series of electronic messages with MAGERRAMOV. During the exchange, CS-1 informed MAGERRAMOV, among other things, that "Evgeny [BOKOV] will give you [\$]650[, ]000." MAGERRAMOV replied: "Good . . . As soon as we get the money, we can start the work[.]" Based on my participation in this investigation, I believe that MAGERRAMOV was telling CS-1 that, once he had received the \$650,000 payment for the May 2018 carfentanil transactions, he and his associates would begin preparing additional cartentanil to provide to the DTO. CS-1 then asked MAGERRAMOV, in sum and substance, whether MAGERRAMOV had received the July 2018 Payment from BOKOV. MAGERRAMOV




confirmed that BOKOV had transferred approximately €15,000 of CS-1's money into the Magerramov Account.

WHEREFORE, your deponent respectfully requests that warrants be issued for the arrests of JEVGENI BOKOV, AMID MAGERRAMOV, NIKOLAI NIFTALIJEV, and VITALI VORONJUK, the defendants, and that they be arrested and imprisoned, or bailed, as the case may be.

  
\_\_\_\_\_  
THOMAS W. FRICK  
Special Agent  
Drug Enforcement Administration

Sworn to before me this  
7th day of August, 2018

  
\_\_\_\_\_  
THE HONORABLE KATHARINE H. PARKER  
UNITED STATES MAGISTRATE JUDGE  
SOUTHERN DISTRICT OF NEW YORK